REPORTING PERIOD: 2002 – 3rd Quarter – April 1, 2002 through June 30, 2002

I. INFORMATION:

State and Department:	Missouri Department of Natural Resources
Title of Project:	Hazardous Waste Enforcement Data Quality Improvement Project
	Enforcement and Compliance Assurance Grants
Grant Contact Person:	Kathy Flippin, Hazardous Waste Unit Chief
Funds Received by State:	July 1, 2001
EPA Regional Project Officer:	Carol Clopton
Author of Report:	Millie Wieberg, Data Quality Analyst

II. STATUS OF PROJECT MILESTONES

(The dates on the schedule in the Narrative Description of Project which assumed a project period of April 1, 2001 through March 31, 2002 were adjusted below to reflect when funds were received by the state to begin the project. The Project Period on the Grant Agreement is May 15, 2001 through June 30, 2002, but funds were not received until July 1, 2001. Therefore, all anticipated completion dates are moved three months forward from the date of April 1, 2001 that was originally anticipated in the Narrative Description of Project.)

PROJECT MILESTONES	ANTICIPATED COMPLETION DATE	COMPLETION DATE
Hire DQA	July 2, 2001	July 3, 2001
Complete DQA training	August 1, 2001	October 4, 2001
Complete review of RCRAInfo data on formal/informal enforcement back to 7/1/96	September 30, 2001	September 27, 2001
Complete ongoing data improvement in I&E database and ETS	Ongoing	Ongoing
Complete work on RCRAInfo to 7/1/90	December 31, 2001	Ongoing
Data review/repair done for enforcement data in I&E database to 1/1/98	December 31, 2001	Ongoing
Data review/repair inspection data in I&E	December 31, 2001	Ongoing

database to 6/30/95		
Complete data improvement in I&E database and ETS	Ongoing	Ongoing

III.   STATUS OF PROJECT COMPLETION

The fourth quarter of the project is complete. In depth file review for compliance information was the primary focus of the work in this quarter. In addition, we completed our OTIS inspection audit and worked to resolve SNY and SNN data entry. I have done a review of all Handler and Evaluation Logs (HELs) back to 1981.

IV.   RESULTS

We are current on entering and updating data in RCRAInfo as the Handler Evaluation Forms (HELs) are received, with the exception of 4 facilities. Two facilities were found in the HWP's I&E database but not in RCRAInfo. The other two have not yet been assigned EPA identification numbers.

I worked with Environment Specialists Mike Menneke and Rachel Claunch in preparing and updating HELs on several old evaluations that had discrepancies. Once resolved, the evaluation data was entered into RCRAInfo.

Lists of facilities that needed return to compliance dates were provided to each Regional Office last year. The compliance dates returned by the Regional Offices were entered into RCRAInfo and the I&E database. Compliance dates were not provided for many of the evaluations and I began file searches to obtain the data. Problems were encountered during the file searches, which I will explain later in this report.

Region VII EPA provided Mrs. Flippin a RCRA Idea Web Query of facilities that had never been inspected. These included: Small Quantity Generators–3133, Large Quantity Generators–190, Conditionally Exempt Quantity Generators–1006, and Transporters–256. Mike Menneke, Environmental Specialist, checked the I&E database to find inspection dates. For those he found, I completed checks in RCRAInfo. If the information was not in RCRAInfo, or a HEL could not be found, one was completed. Many of these inspections were "oil", "resource recovery" and, "complaint investigations." This information will be discussed with Mrs. Flippin prior to entering into RCRAInfo.

The inspection audit was completed and updated on http://www.otis.abtassoc.com/audit/ . One facility, Safety Kleen, had an evaluation in the record that did not appear on RCRAInfo or the I&E database (the HEL was still attached to the inspection in the file). Two facilities were located under different names in the file room. No other problems were found.

I pulled a query from RCRAInfo regarding Significant Non-Compliers (SNYs) and Formal Enforcements within 5 Years, and Facility Inspected and Non-Compliance Last 2 Years. Since the queries only provided the EPA ID number, I had to check the data screens to obtain the name

of the facility before comparing data entry with the information on the HEL form and in the file. Mrs. Flippin advised our first priority was assuring accuracy of SNY/SNN designations, and our second priority is assuring penalty payment entry. The enforcement workers were consulted, as needed, to obtain current information. From the 604 facilities shown on the query "Quarters in Non-Compliance," 251 needed a data entry search. The data entry search showed that 52

facilities had not returned to compliance and file searches were needed to determine compliance status. Mrs. Flippin asked that I type a list of facilities with no return to compliance information in the file so that she could forward this to the Regional Offices and Commercial Facilities for their review and input.

Mrs. Flippin provided "Reports To the Missouri Hazardous Waste Management Commission" from the present back to 1991 that described enforcement actions. I verified enforcement data entry, completed needed file searches, and made additions/corrections as needed. This report dates from the present back to 1991.

I reviewed the notebooks located on shelves containing HELs and printouts dating back to approximately 1981. The HELs were filed alphabetically in the month received in the office, instead of being filed alphabetically. It was time consuming searching for specific data.

While performing the tasks noted above, I encountered the following problems regarding various sites:
1. No HEL was completed/submitted following an evaluation.
2. Conflicting dates were entered on the HELs.
3. The wrong facility ID # was entered on the HEL. Consequently, evaluations and violations were entered for the wrong facility.
4. HELs had evaluation/violation entry errors, but no file could be found to obtain data to correct the errors.
5. HELs were submitted with violations listed, but no enforcement action entered. File searches showed that enforcement actions were taken.
6. File checks showed enforcement action was taken and violations were corrected by the facility, but no updated HEL was submitted for data entry.
7. We found data entry errors on HELs submitted for additional violations, new enforcement actions, etc. In some cases the same violations were entered twice. These errors doubled the violations for the evaluation.
8. I found errors in how violations were linked with a number of violations (i.e. violations from a current evaluation were linked to an evaluation conducted years earlier).
9. The problem noted in #8 above also existed between enforcements and linking numbers.
10. Some older files held letters from the facility indicating compliance, but there was no verifying correspondence from the department. I made copies of these letters and a list to discuss these with Mrs. Flippin.
11. In checking enforcement actions listed on the Commission Report there were enforcement cases settled due to referrals or complaint investigations, etc. and with no clear evaluation date. Some of these were never entered into RCRAInfo or the I&E database.
12. A few sites with inspections and enforcement actions were never assigned an ID number.

13. Many of the enforcement cases are large (multi file) with lots of correspondence, forms, etc., to review while searching for enforcement and return to compliance dates. While necessary, it is very time consuming. It is also confusing when there are two or three enforcement activities occurring at the same time.

Missouri Data Quality Improvement Project – 4-1-02 through 6-30-02 – Page 4

Due to the problems noted above, I started the following lists:

PROBLEMS & QUESTIONS – This is a list of facilities with problems/questions that I will need to discuss with Ms. Flippin for resolution.
FILE REVIEW – This is a list of facilities with no return to compliance information (no file found, no compliance information in file, no inspection report in file noting the evaluation).
FACILITIES AND INFORMATION - PROBABLE RTC – This is a list of facilities that appear to have never returned to compliance. During file check I obtained information/letters that could indicate return to compliance but there was no letter from the department confirming compliance.